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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

DON'T SHOOT PORTLAND, a nonprofit corporation, in its individual capacity, NICHOLAS J. ROBERTS, in an individual capacity and on behalf of themselves and all others similarly situated, MICHELLE "MISHA" BELDEN, in an individual capacity and on behalf of themselves and all others similarly situated,

Case No. 3:20-cv-00917-HZ

DECLARATION OF MICHAEL REESE

PLAINTIFFS,

v.

CITY OF PORTLAND, a municipal corporation,

DEFENDANT.

I, Michael Reese, declare as follows:

1. I am the Sheriff of Multnomah County, Oregon. I was originally sworn in as Multnomah County Sheriff on August 17, 2016 assuming the vacant role and later elected during the regular election in November 2016. I was elected to serve my first full term as Sheriff on May 15, 2018.

2. I started my career in law enforcement in 1989 as a Deputy Sheriff with Multnomah County. In 1994, I transferred to the City of Portland's Bureau of Police ("PPB") where I served as an officer, sergeant, lieutenant, captain, commander and ultimately as Chief of Police. I was PPB's Chief of Police from May 2010 to January 2015.

3. I was raised in Portland and attended Roosevelt High School. I graduated from Portland State University ("PSU") in 1984 with a Bachelor of Science in Psychology. I later returned to PSU and earned an Executive Masters Degree in Public Administration.

4. The Multnomah County Detention Center ("MCDC") is located at 1120 SW Third Avenue, Portland, Oregon and is one of three Multnomah County detention facilities. The other two are Inverness Jail and the Donald E Long Juvenile Detention Center. MCDC serves as the initial booking facility for all arrestees in Multnomah County, houses adults in custody for the County, as well as state and federal inmates involved in court matters. MCDC is a maximum security facility.

5. On Friday, May 29, 2020 approximately 250 adults were in custody at MCDC, and approximately 70 Multnomah County Corrections' ("Corrections") employees, to include medical professionals and designated representatives of the court were working at 11:00 p.m.

6. On Friday, May 29, 2020, at around 11:00 p.m. persons smashed windows and security doors and entered a large ground-level space housing the Corrections Records Unit and comprised of individual offices and a large common space. Once inside the building, these persons spray-painted graffiti, overturned office equipment, and destroyed property. These persons threw flares and other incendiary devices into the office causing fires. The building's fire alarm system and ceiling sprinklers activated, which helped control and extinguish the fires. Corrections employees working at this time were forced to evacuate to a secure area inside MCDC.

7. The persons trespassing, destroying property, throwing flares and other incendiary devices inside the MCDC were removed from MCDC premises by the use of CS tear gas, by law enforcement.

8. The actions of these persons trespassing and lighting fires inside the MCDC on May 29, 2020 put Corrections staff, adults in custody and the public at extreme risk. The trespass and arson could have had tragic consequences. I have instructed my deputies to use objectively reasonable force under the circumstances then facing them to prevent property damage and to prevent and mitigate threats to life safety at MCDC.

9. The extent of property damage caused by the persons who trespassed, destroyed property and threw flares and other incendiary devices inside the MCDC on May 29, 2020 continues to be assessed by risk management and county facilities. It is too early to provide a preliminary estimate of the cost of damages.

10. On the night of June 6, 2020 into the morning hours of June 7, 2020 an improvised explosive device (IED) was launched over the fence surrounding the MCDC. The IED injured three sheriff deputies. I've been informed by the Portland Fire Bureau Investigators that the IED had the force equal to one quarter stick of dynamite.

11. I make this declaration in support of defendant City of Portland's Response to Motion for a Temporary Restraining Order and Preliminary Injunction.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: 6/08/2020

Michael Reese